

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Maria De-Lourdes Garza-Zamora *Principal*

Mexico

Case Number:

YOB: 1980

M-18-2621-M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 20, 2018 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Karen Yadira Mejia-Portillo and Geidy Yarely Menjivar-Contreras, both citizens and nationals of Honduras, along with three (3) other undocumented aliens, for a total of five (5), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempted to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, to wit: a residence in Alton, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii)
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On December 20, 2018, Border Patrol Agents conducting surveillance on the residence observed a black Chevy Impala leave the residence. Agents contacted the Hidalgo County Constable Office (HCCO) for assistance. HCCO Deputy encountered the vehicle and conducted a vehicle stop for Failure to Maintain Lane. During the vehicle stop, Agents approached and questioned the driver, identified as Maria De-Lourdes Garza-Zamora, and determined she was illegally present in the United States. Agents questioned Garza about an escapee named Eduardo Roman-Martinez. She stated that Roman, her boyfriend, was at her residence. Garza gave agents verbal consent to search her residence.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by Robert Guerra
ALISA

Julio C. Peña
Signature of Complainant

Julio C. Peña Senior Patrol Agent
Printed Name of Complainant

Sworn to before me and subscribed in my presence,

December 21, 2018 9:03am.
Date

at McAllen, Texas
City and State

Juan F. Alanis, U. S. Magistrate Judge
Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18-2621-M

RE: Maria De-Lourdes Garza-Zamora

CONTINUATION:

Agents performed a search of the residence and found Roman. Agents also discovered an additional five (5) subjects in the residence. An immigration inspection was conducted and revealed that the five (5) subjects were all undocumented aliens illegally present in the United States.

Agents also discovered two (2) firearms and a small amount of marijuana.

All the subjects were transported to the McAllen Border Patrol Station for processing.

PRINCIPAL STATEMENT:

Maria De Lourdes Garza-Zamora was read her Miranda Rights. She understood her rights and provided a sworn statement.

Garza, a citizen of Mexico, stated that she has known Roman for about a month. Garza claims Roman told her that he escaped from Border Patrol, however, Garza didn't believe it. Garza told agents she picked up the five people and brought them to her home. Garza stated the females she picked up yesterday (December 19, 2018) and the males have been at the house a little longer. Garza has been transporting aliens and harboring them on varies occasions for about three months. Garza would get paid \$150 USD for each illegal person she transported and harbored. Garza stated she would purchase food and the illegal aliens would cook. Garza told the illegal aliens not to make noise. Garza claims that she has transported and harbored about 20 illegal aliens. Garza claims someone would call her to pick up the illegal aliens. Garza denied any knowledge regarding the weapons and a small bag of narcotics found at her house.

Garza identified Roman, through a photo lineup, as someone she has known for about a month and was staying at the residence.

MATERIAL WITNESS STATEMENT:

Karen Yadira Mejia- Portillo and Geidy Yarely Menjivar-Contreras were read their Miranda Rights. Both understood their rights and they each provided a sworn statement.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18-2621-M

RE: Maria De-Lourdes Garza-Zamora

CONTINUATION:

Mejia, a citizen of Honduras, stated she crossed into the United States on a raft. Mejia crossed with two other girls. After crossing, they ran for a bit and were picked up by a beige four door truck. They were then transported to another location where a lady was waiting. The lady transported them to the house in a small four door beige car. Mejia described the lady as fat with black hair, a tattoo on her neck, and a piercing below her lip. At the house, the lady asked them if they were hungry and told them where to sleep. Mejia stated the smuggling arrangements cost \$2,000 USD. Mejia told agents she was not aware of any weapons or narcotics.

Mejia identified Garza, through a photo lineup, as the lady that picked her up and took her to the stash house.

Mejia identified Roman, through a photo lineup, as a person she saw at the house and would leave with Garza.

Menjivar, a citizen of Honduras, stated she crossed into the United States on a raft. Menjivar crossed with three other females. Menjivar claims they were instructed to run to a truck that would be waiting. After crossing, Menjivar ran and found a beige truck that drove her to a lady in a four door car. Menjivar stated the lady then took them to the house. Menjivar described the lady as short and fat, black hair, tattoo on her neck, with a piercing below the lip. Menjivar stated lady was the owner of the house because she took her there. At the house, the lady instructed the men to sleep on the floor and the women on the bed. The lady also told them if they were hungry to make something to eat. During her stay at the house, Menjivar stated that a male subject offered them food. Before being apprehended, she was told by the lady that someone would be picking her up. Menjivar made her smuggling arrangements for \$2,000 USD with a smuggler in Mexico

Menjivar identified Garza, through a photo lineup, as the lady that picked her up and took her to the house.

Menjivar identified Roman, through a photo lineup, as the male that was at the house and offered her food.